

SIGAL CHATTAH, ESQ.  
 Nevada Bar No.: 8264  
 CHATTAH LAW GROUP  
 5875 S. Rainbow Blvd #203  
 Las Vegas, Nevada 89118  
 Tel: (702) 360-6200  
 Fax: (702) 643-6292  
[Chattahlaw@gmail.com](mailto:Chattahlaw@gmail.com)  
*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHAWN MEEHAN, an individual, JANINE HANSEN, and  
 individual, LYNN CHAPMAN, an individual, MELISSA  
 CLEMENT, an individual,

Plaintiffs,

vs.

STEPHEN F. SISOLAK, in his official capacity as Governor  
 of the State of Nevada, AARON DARNELL FORD, in his  
 official capacity as the Attorney General of the State of  
 Nevada, BRENDA ERDOES, in her official capacity as  
 Head of Legislative Counsel Bureau, NICOLE  
 CANNIZZARO, in her official capacity as Chair of the  
 Legislative Commission, DOES 1 through 100.

Defendants.

**Case No: 3:21cv 00100**  
**MMD-WGC**

**REPLY**

**PLAINTIFFS' REPLY TO DEFENDANTS' RESPONSE TO EMERGENCY MOTION**  
**FOR PRELIMINARY INJUNCTION**

COME NOW, PLAINTIFFS, SHAWN MEEHAN *Et Al*, by and through the  
 undersigned attorney of record, SIGAL CHATTAH, ESQ., of the CHATTAH LAW GROUP,  
 and hereby submit to this Court, Plaintiffs' Reply to Defendants' Response to Plaintiffs'  
 Motion for a Preliminary Injunction against Defendants, to enjoin them from dilatory and

1 arbitrary closure of the State Legislative Building, precluding Plaintiffs (and others) from  
 2 engaging in constitutional lobbying efforts.

3 The purpose of the Motion filed on February 24, 2021, was made on an emergency basis,  
 4 given the fact that three weeks had passed since the 81<sup>st</sup> Legislative Session commenced on  
 5 February 1, 2021, and the State Legislature was closed to the public, citing to the Governor's  
 6 Emergency Orders on March 12, 2020, over one year ago.

7  
 8 At the time the Motion for Preliminary Injunction was filed, it was clear that there was  
 9 no longer an Emergency, but an obvious abuse of arbitrary and capricious power to deny access  
 10 to the public of the Legislative Process, denying Plaintiffs' constitutional rights.

11 At this juncture, on April 15, 2021, Defendants announced the reopening of the  
 12 Legislative building, 75 days into a 120-day Legislative Session, rendering the Emergency  
 13 Motion and the purpose of Plaintiffs' requests therein moot, allowing this Court to vacate the  
 14 hearing scheduled for same.  
 15

16  
 17 **A. PLAINTIFFS CONCEDE THAT THE IMMEDIATE RELIEF REQUESTED**  
 18 **TO REOPEN THE LEGISLATIVE BUILDING IS MOOT SINCE THE**  
**BUILDING HAS REOPENED**

19 Plaintiffs' Motion for Preliminary Injunction is the only matter under review by this  
 20 Court at this juncture. The reopening of the Legislative Building by Defendants on April 15,  
 21 2021 renders the Motion and the related relief to the issuance of an Order of 1) enjoining  
 22 Defendants of dilatory and arbitrary closure of the Legislative Building; 2) mandating that  
 23 Defendants immediately allow Plaintiffs and other members of the public petition their State  
 24 officials in person; 3) compliance must adhere to the social distancing requirements mandated  
 25 by the Nevada COVID-19 playbook, completely moot.  
 26  
 27  
 28

**B. PLAINTIFFS ARE STILL ENTITLED TO DECLARATORY RELIEF WHICH IS NOT THE SUBJECT OF THE MOTION FOR PRELIMINARY INJUNCTION OR REVIEWABLE UNDER SAME**

On April 26, 2021, Defendants filed their Answer to Plaintiffs' Complaint. Specifically, to the allegations alleged in Plaintiffs' Sixth Claim for Relief for Declaratory Action, Defendants responded the following:

*VI.  
SIXTH CLAIM FOR RELIEF DECLARATORY ACTION (Against All Defendants)  
¶¶ 111-117.*

*Legislative Defendants deny the allegations in paragraphs 111-117 of the Complaint, including, without limitation, all legal conclusions cast in the form of factual allegations.*

*See [ECF 31] p5/8 lns 15-20.*

Any discussions regarding immunity and declaratory relief are wholly inappropriate at this juncture and are not the subject of Plaintiffs' Motion for Preliminary Injunction, rendered moot at this time. Therefore, any matters regarding immunity and declaratory relief must be addressed by this Court when and if presented exclusively on its merits through a separate Motion for relief of same.

Further, attempting to inject discussions regarding Declaratory Relief and Defendants' immunity into Plaintiffs' mooted Request for Preliminary Injunction are inappropriate and outside this Court's purview of the requested relief made by Plaintiffs and must be addressed in a separate pleading.

Accordingly, Plaintiffs are entitled to engage in discovery on all allegations and representations made by Defendants in their Response to Plaintiffs' Motion for Preliminary Injunction.

**CONCLUSION**

In light of Defendants' actions on April 15, 2021, reopening the building, 75 days into the 81<sup>st</sup> Legislative Session, the Legislative Building is now open to the public and Plaintiffs with precautionary measures in place rendering the Motion for Preliminary Injunction moot.

Therefore, this Court may vacate the hearing dated May 10<sup>th</sup>, 2021 and allow Plaintiffs to proceed with discovery in the ordinary course, in the interest of fair play and substantial justice on the merits of this matter.

DATED this 3rd day of May, 2021.

**CHATTAH LAW GROUP**

/s/ Sigal Chattah  
SIGNAL CHATTAH, ESQ.  
CHATTAH LAW GROUP  
5875 S. Rainbow Blvd. #203  
Las Vegas, Nevada 89118  
Tel.:(702) 360-6200  
*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 3rd, 2021, the foregoing Reply to Defendants' Response to Plaintiff's Emergency Motion for Preliminary Injunction was filed electronically with the Clerk of the Court for the United States District Court through the Court's CM/ECF system. I certify that all participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Sigal Chattah  
Sigal Chattah, Esq.